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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

This document relates to:

ALL ACTIONS

MDL No. 2843
Case No. 18-md-02843-VC

**DECLARATION OF CARI C.
LAUFENBERG AND MATTHEW S.
MELAMED IN SUPPORT OF
PLAINTIFFS' SUPPLEMENTAL BRIEF
IN SUPPORT OF SANCTIONS**

Judge: Hon. Vince Chhabria
Courtroom: 4, 17th Floor
Hearing Date: September 2, 2022
Hearing Time: 10:00 a.m.

UNREDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

I, Cari C. Laufenberg, and I, Matthew S. Melamed, declare and state as follows:

1. Cari C. Laufenberg is a Partner at the law firm of Keller Rohrback L.L.P. and Matthew S. Melamed is a Partner at the law firm of Bleichmar Fonti & Auld LLP. We are Counsel for Plaintiffs in the above-captioned action.

2. We have personal knowledge of the facts set forth herein and, if called as witnesses, could and would testify competently to them, with the exception of the facts in paragraph 4, which are only within Ms. Laufenberg's personal knowledge.

3. This declaration is made in support of Plaintiffs' Supplemental Brief in Support of Sanctions.

4. On April 8, 2022, the parties participated in a meet and confer. Among the counsel representing the parties during the meet and confer were Ms. Laufenberg for Plaintiffs and Rose Ring for Facebook. During the meet and confer, Facebook agreed to provide Plaintiffs a letter describing its process for collecting and reviewing Quips and other types of internal documents—namely, Tasks, Wikis, and Facebook Workplace Groups—by May 6, 2022.

5. Thereafter, we attended numerous meet and confers where Plaintiffs asked Facebook to provide the letter.

6. On July 14, 2022, we participated in a meet and confer with Facebook. Representing Facebook during the meet and confer were Ms. Ring, Martie Kutcher-Clark, Amanda Aycock, Amanda Machin, and Brooke Myers Wallace. When Plaintiffs asked when Facebook would provide the letter describing its process for collecting and producing Quips and other specific types of internal documents, Ms. Ring expressed frustration that Plaintiffs continued to raise the issue. Among other things, she stated her belief that Plaintiffs were not entitled to the information they sought and did not understand why Facebook had agreed to provide the information. We responded that this was a reversal of Facebook's prior promise to provide the letter and asked for clarification regarding Facebook's position. Ultimately, Ms. Ring stated that since Facebook had promised to provide the letter, it would do so. However, she stated that the

letter was her lowest priority and would not provide a date by which she would provide it to Plaintiffs.

We declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: August 8, 2022

By: */s/ Cari C. Laufenberg*
Cari C. Laufenberg

Executed at: Seattle, Washington

Dated: August 8, 2022

By: */s/ Matthew S. Melamed*
Matthew S. Melamed

Executed at: Oakland, California

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the signatories. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8th day of August, 2022, at Oakland, California.

/s/ Lesley E. Weaver

Lesley E. Weaver